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Michael Richard Lynch*

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

MICHAEL RICHARD LYNCH and
STEPHEN KEITH CHAMBERLAIN,

Defendants.

Case No.: 3:18-cr-00577-CRB
Judge: Hon. Charles Breyer

**DECLARATION OF CELESTE L.M.
KOELEVELD IN SUPPORT OF
DEFENDANT MICHAEL RICHARD
LYNCH'S 29(A) MOTION FOR
ACQUITTAL ON COUNT 16**

Court: Courtroom 6 – 17th Floor
Date Filed: May 20, 2024
Trial Date: March 18, 2024

DECLARATION OF CELESTE L.M. KOELEVELD

I, Celeste L.M. Koeleveld, declare as follows:

1. I am an attorney licensed to practice law in New York and a partner at the law firm of Clifford Chance US LLP, counsel for the defendant Michael Richard Lynch.

2. I have knowledge of the facts set forth herein, and if called upon as a witness to testify thereto, I could do so competently under oath.

3. Attached hereto as Exhibit 1 is a true and correct copy of HP's press release, issued August 18, 2011 (Tr. Ex. 2295).

4. Attached hereto as Exhibit 2 is a true and correct copy of the press announcement referred to during the testimony of Andy Johnson (Tr. Ex. 2306).

5. Attached hereto as Exhibit 3 is a true and correct copy of the irrevocable undertaking (Tr. Ex. 2308).

I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed May 20, 2024, in San Francisco, California.

/s/ Celeste L.M. Koeleveld
Celeste L.M. Koeleveld